

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

| | | |
|--------------------------|---|---------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | Criminal No. 18-292 |
| |) | |
| |) | |
| ROBERT BOWERS |) | |

REQUEST TO FILE A MOTION UNDER SEAL AND *EX PARTE*

Defendant, Robert Bowers, through undersigned counsel, respectfully requests an order allowing him to file a motion under seal and *ex parte*. In support of this request, counsel states as follows:

1. Mr. Bowers requests permission to file a document under seal and *ex parte*.
2. The document contains information protected by the work product doctrine pertaining to the defense investigation.
3. Mr. Bowers further requests permission to file the document under seal without the filing of a redacted version.

Respectfully submitted,

/s/ Judy Clarke

Judy Clarke

Clarke Johnston Thorp & Rice, PC

/s/ Michael J. Novara

Michael J. Novara

First Assistant Federal Public Defender

/s/ Elisa A. Long

Elisa A. Long

Assistant Federal Public Defender

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ORDER OF COURT

Upon consideration of Robert Bowers' Motion to File a Document Under Seal and *Ex Parte*, it is hereby ORDERED that the Motion is GRANTED.

It is further ORDERED that the document shall remain sealed until further Order of the Court.

It is further ORDERED that Mr. Bowers is not required to file a redacted version of the document.

Date

Donetta W. Ambrose
United States District Judge